



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



November 16, 2010

Mr. Gary Zrelak  
Director of Operations  
Greater New Haven WPCA  
260 East Street  
New Haven, CT 06511

Re: Notice of Violation  
DEP/WPC 10-010  
Permit No. CT0100366  
Boulevard and East Street Pump Stations

Dear Mr. Zrelak:

We received your response dated October 20, 2010 to the Notice of Violation (NOV) issued on September 24, 2010 for the Boulevard and East Street Pump Stations. Several issues still remain unresolved. Please provide the following additional information and/or complete the following measures:

1. Air Ventilation/Odor Control/Corrosion

Hydrogen sulfide is an extremely corrosive gas that is dangerous to breathe. If the scrubbers are not functional, it is the responsibility of the GNHWPCA to find a way to mitigate odors (e.g., replace the scrubbers or temporarily use potassium permanganate spray) while continuing to protect its workers with a properly functioning air ventilation system.

Running the air ventilation system on an as-needed basis is not an adequate response, even if you are trying to be a good neighbor. The air ventilation systems at the pump stations were installed not only to protect your workers, but also to protect equipment and building materials from corrosion. Based on the observations of DEP staff and the 2007 report prepared by CH2MHILL, it appears that significant corrosion may have already occurred which could compromise the structural integrity of the buildings. The 2007 report included several recommendations to be implemented at both pump stations, including additional testing (the Half-Cell Test) to identify the extent of corrosion throughout the slab in the Blower Room at the Boulevard Pump Station.

Please provide verification that the recommendations in the 2007 report were completed, including the results of the Half-Cell Test.

2. In-Place Monitoring

It was indicated in the cover letter that fixed-in-place monitoring was part of the original construction. However, later statements in the attached table (#4 and #28) state that no in-house monitoring ever existed.

Was the fixed-in-place monitoring part of the original design but never constructed, or were they later removed?

3. Fire Alarm Panel

If the old fire alarm panel on the exterior wall near the entrance is only used as a junction box to the new panel, it should be clear to any emergency response personnel that it is no longer active as the main fire alarm panel. Therefore, please remove the indicator panel and replace with a plain panel.

4. Sky-Lights

It was observed in a visit subsequent to the issuance of the NOV that the sky-lights are not rated to carry human weight.

Please complete one of the following corrective measures:

- Replace the sky lights so they are rated to carry human weight,
- Install cages around the sky-lights, or
- Implement a procedure where workers are harnessed while working on the roof.

5. Eyewash

Even though the facility no longer services batteries containing sulfuric acid, we think it would be prudent to replace the eyewash due the nature of the material (fine grit and screenings) that is handled at the pump stations.

6. Please sign and return the Certification of Accuracy that was attached to the NOV.

We request that you provide the information requested and/or provide us with a timetable for completing the measures requested within 30 days of the date of this letter. Please contact me at (860) 424-3754 if you would like to discuss further.

Sincerely,



Ivonne Grajko Hall, P.E.  
Sanitary Engineer  
Planning & Standards Division  
Bureau of Water Protection & Land Reuse

cc: Sidney Holbrook (GNHWPCA)  
Tom Sgroi, P.E. (GNHWPCA)  
Gabe Varca (GNHWPCA)  
Michael Fedak (EPA)  
Lee Rogers (DEP)